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ORIGINAL

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

v.

Case: 2:19-cr-20388
Judge: Edmunds, Nancy G.
MJ: Grand, David R.
Filed: 06-10-2019 At 03:23 PM
INFO USA v WORLEY (dat)

ZACHARY WORLEY,

VIO: 18 U.S.C. § 2422(b)

Defendant.

_____ /

INFORMATION

GENERAL ALLEGATIONS

At all times relevant to this Information:

A girl, MV-1, was a victim of the crimes alleged in Count One. MV-1 was and is a resident of the Eastern District of Michigan, and was born in November of 2003.

COUNT ONE

(Coercion and Enticement of a Minor 18 U.S.C. § 2422(b)).

From on or about November 2018 through on or about February 16, 2019, in the Eastern District of Michigan and elsewhere, the defendant, ZACHARY WORLEY, did knowingly use a facility and means of interstate and foreign commerce (to wit: the Internet) to persuade, induce, entice and coerce a person who had not attained the age of 18 years (to wit: MV-1) to engage in any sexual activity for which any person could be charged with a criminal offense, including but not limited to the production of child pornography as described in 18 U.S.C. § 2256(8), all in violation of Title 18, United States Code, Section 2422(b).

FORFEITURE ALLEGATIONS

The allegations alleged in Count One of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2428.

If convicted of an offense charged and set forth above, ZACHARY WORLEY shall forfeit to the United States: (1) any property real or personal, used or intended to be used to commit or to facilitate the commission of the offense; and (2) any property, real or personal, that constitutes or is derived from proceeds traceable to the offense.

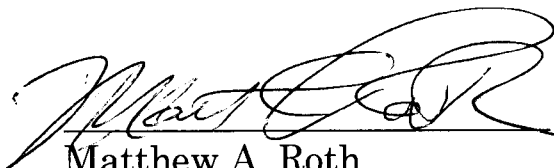
Such property includes, but is not limited to, a money judgment equal to an amount as proved in this matter, representing the total value of property subject to forfeiture from the defendant for his violation of 18 U.S.C. § 2422(b), as alleged in this Information. If the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the Court;

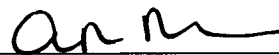
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek to forfeit any other property of the defendant up to the listed value.

MATTHEW SCHNEIDER
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Dated: June 10, 2019

United States District Court
Eastern District of Michigan

Criminal Case

Case: 2:19-cr-20388
Judge: Edmunds, Nancy G.
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to ensure that the information provided is accurate and complete.

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Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>AR</i>

Case Title: USA v. Zachary Worley

County where offense occurred : Wayne and Oakland

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

 Indictment/ Information --- no prior complaint.

 Indictment/ ☒ Information --- based upon prior complaint [Case number: 19-mj-30068]

 Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: ~~19-cr-20388~~ *job* Judge: ~~Edmunds, Nancy G.~~ *job*

- job* ☒ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 10, 2019

Date

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.